**Program Source Diversity Proposal for the Proposed Comcast-NBCU Merger**

The Merged Entity has the incentive and ability to discriminate against independent producers of content and reduce opportunities for those content creators. Viewpoint diversity is not possible without a diverse set of content owners. To address the reduction in competition, independence and diversity resulting from the proposed merger, we urge the Commission to adopt the following program source diversity requirement, ensuring independent and diverse viewpoints are aired on channels and content distribution platforms controlled by the Merged Entity. This document provides specific language to implement such a standard and addresses concerns raised by the WGAW throughout this merger review.

- **Program Source Diversity Requirement:**

  - *Programming Slots:* 25% of first-run programming, measured by scheduled running time, scheduled during primetime viewing hours (7-11PM, if programmed by the network) on all broadcast and cable channels owned, operated or controlled by the Merged Entity must be filled with programs acquired from an independent producer. For any "on demand" service, 25% of the content offered should be independently produced.

  - *Programming Exclusions:* News, Sports and Reality Programming are excluded.

  - *Compliance Measurement:* Compliance should be measured quarterly.

- **Independent Producer Definition:** Independent producers are studios or production entities that are not owned or affiliated by any broadcast or cable network or any MVPD provider. In order to qualify as an independent production, Comcast - NBCU may not take a financial stake in the production, nor control domestic or foreign syndication rights.

- **Licensing Period:** The network license period shall not exceed 4 years. At which point, the independent producer could seek bids for programming from other networks.

- **Implementation:** Effective on the merger closing date, the Merged Entity shall have four years to reach compliance with the Program Source Diversity Requirement.